



# United States Department of the Interior

## NATIONAL PARK SERVICE

1849 C Street, N.W.  
Washington, D.C. 20240

### Memorandum

To: Director

Through: Chief, Office of Policy *Al Rye 12/24/14* *John M. Smith*

From: (Acting) Assistant Director, Partnerships and Civic Engagement

Subject: Waiver of Certain Provisions of Management Policies (2006) and Director's Order #21 Prohibiting Naming as a Form of Donor Recognition

The Office of Partnerships and Philanthropic Stewardship (PPS) requests a waiver of the provisions of Management Policies (2006) and Director's Order #21: Donations and Fundraising that prohibit naming as a form of donor recognition.

The waiver would temporarily restructure National Park Service (NPS) naming policy to conform to the standard definition of naming in the philanthropic sector until such time as a revised Director's Order #21 can be completed.<sup>1</sup> Naming is an important way of recognizing major gifts and is now so prevalent that it has become an expectation for many donors.<sup>2</sup> The public is also accustomed to this type of donor recognition. This waiver would not change the prohibition on logo placement on donor-funded items in parks. (Recognition for all other donated or donor-funded items, including interpretive waysides, recreation equipment and other items that remain in the park, may include a short, discreet, unobtrusive credit line using the donor's name, but not name script or logo). See, Director's Order #21, section 10.2.2. This waiver does not change existing NPS policies with respect to *commemorative* naming. Naming of *geographic features* is the province of the U.S. Board on Geographic Names by law (see 43 USC 364—364f), and thus is beyond the scope of this waiver.

### Current NPS Policy

NPS policy currently prohibits the use of naming as a form of donor recognition. Management Policies (2006) addresses donor recognition in section 9.6.1, as follows:

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<sup>1</sup> PPS has discussions with partners in which naming includes everything from plaques bearing a donor's name on a bench, to naming buildings on museum and school campuses, positions, programs, and endowments (see, for example the section on Background and Related Efforts later in this document). Others in the philanthropic sector use the term "naming rights" when talking about naming buildings, etc., and "name recognition" when discussing plaques bearing a donor's name on a bench or in a renovated room. The NPS has followed this organizing framework while prohibiting both forms of recognition.

<sup>2</sup> Fusch, Daniel. "The Naming Opportunities Plan and Donor Stewardship." Academic Impressions. 31 Aug. 2012 (available online at <<http://www.academicimpressions.com/news/naming-opportunities-plan-and-donor-stewardship>>).

All donor recognition must be consistent with Director's Order #21: Donations and Fundraising. In accordance with Director's Order #21, the naming of rooms, features, or park facilities will not be used to recognize monetary or in-kind donations to a park or to the National Park Service.

Director's Order #21: Donations and Fundraising, approved July 11, 2008, provides in pertinent part:

## **10.2 In-Park Recognition.**

\* \* \*

Donor recognition is not allowed on motor vehicles or on bricks, benches or other park furnishings.

\* \* \*

### **10.2.6 In-Park Displays, Name Plaques and Plates.**

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The naming of rooms, features, or park facilities will not be used to recognize monetary or in-kind donations to a park or the NPS.

## **Background/Related Efforts**

### National Park System Advisory Board's Committee on Partnerships and Philanthropy

The philanthropic sector, partnership practices, and donor opportunities have evolved since the issuance of Management Policies and Director's Order #21 in 2006 and 2008, respectively. Recognizing this, the Director asked the National Park System Advisory Board (Advisory Board) to create a Committee on Partnerships and Philanthropy (Committee) to, in part, make recommendations on policies that would bring NPS business practices in line with the best practices in philanthropy.

On December 5, 2014, the Advisory Board accepted the report of the Committee (the Report).

The Report provides recommendations related to new business behaviors and best practices in philanthropy and partnerships—including policies on donor recognition—that the NPS should consider as it revises Director's Order #21.

The Report states the following with respect to naming:

#### ***Encourage donor recognition through naming opportunities***

Today, Director's Order #21 prohibits donor recognition via naming on specific park assets (e.g. benches, motor vehicles, bricks or other core furnishings). Additionally, inconsistency across the system creates a confusing brand and consumer experience.

Exceptions have been granted by the NPS in some cases; other parks have created workaround solutions.

The Committee believes that naming opportunities are an appropriate form of in-park recognition and recommends a policy that permits its use. Naming opportunities could include, but are not limited to: donor walls, non-historic buildings, rooms, benches, pavers, gardens, vehicles, furniture, digital and media platforms, museum collections, programs, endowed positions, park publications, video credits, media, websites and speaking podiums.

As park assets and units are limited, the Committee recommends that all naming opportunities have a clearly articulated and limited duration. Donors must understand that naming a park asset in perpetuity is not permissible.

### Smithsonian Institution

On October 20, 2014, the Smithsonian Institution announced its first organization-wide fundraising campaign. During the “quiet” phase of the campaign (which began in October 2010), more than \$1 billion of the \$1.5 billion goal was raised. At least nine of the donations have been or will be recognized through naming of spaces in museum facilities.<sup>3</sup> The Appendix includes a list of naming at various Smithsonian facilities, and universities (publicly supported and private institutions).

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<sup>3</sup> The Renwick Gallery’s Grand Salon will be named in honor of David Rubenstein in recognition of his \$5.4 million donation to help renovate the Renwick Gallery.

David H. Koch donated \$35 million for a major renovation of the Smithsonian’s National Museum of Natural History dinosaur hall. The hall will be named in recognition of his gift.

Boeing is giving \$30 million to overhaul the central exhibition showing the milestones of flight at the National Air and Space Museum to be named the Boeing Milestones of Flight Hall.

The National Postal Museum’s William H. Gross Stamp Gallery was named in recognition of his \$8 million donation.

The Oprah Winfrey Theater at the new National Museum of African American History and Culture will recognize her \$13 million donation.

Augustus “Gus” and Deanne Miller’s \$1 million donation established the Augustus and Deanne Miller Acquisitions Fund for the American Experience at the Smithsonian Libraries.

Michael and Suzanne Tennenbaum endowed the Tennenbaum Marine Observatories Network (\$10 million).

The John L. and Hope L. Furth Endowment for the Smithsonian Libraries was started with an unrestricted donation from Mr. and Mrs. Furth.

A. James Clark created the A. James Clark Excellence in History Teaching Program Endowment at the National Museum of American History in 2011, and renewed it in 2014 with a \$5 million gift from The Clark Charitable Foundation. This gift also endowed the A. James Clark Director of Education Outreach position.

## Proposal

PPS proposes that the current policy prohibition be waived, in favor of the following policy statement, which will be incorporated in the revised Director's Order #21:

Interior Spaces in Facilities: The naming of rooms and interior spaces within park facilities is authorized as a form of recognition for donations of five million dollars or more when the donation is intended for use in renovating existing facilities or construction of new facilities. The duration of naming is limited to five years. The gift must include operations, maintenance, and lifecycle costs. Naming may only occur in the new or renovated facility funded by the donation. Historic structures and features may not be named, nor may buildings with existing names be renamed. Any naming must be done in compliance with legislation, including but not limited to the Commemorative Works Act (40 USC 8901—8909) and section 106 (54 USC 306108) of the National Historic Preservation Act (54 USC 300101 *et seq.*).

Naming opportunities must be approved by the Director before an offer may be made to a potential donor. An agreement will be used to lay out the terms of naming, and will include provisions regarding the five-year duration, de-naming, and demolition/renovation of named spaces.

Positions, Programs, Endowments:<sup>4</sup> The naming of programs, positions, and endowments is authorized as a form of recognition for donations given to support a program or position.

Naming opportunities must be approved by the Director before an offer may be made to a potential donor. Any naming must comply with all Federal legislation and regulations, including those respecting hiring. An agreement will be used to lay out the terms of naming, and will include provisions regarding duration, de-naming, and termination/renewal of the position/program/endowment.

When identifying opportunities and thresholds for named positions and programs, the total costs of the position or program—including salaries and benefits, administrative overhead, travel, materials, housing, program funds, and stipends—must be included in the final gift.

Paving Stones and Park Furnishings: Name recognition on bricks, paving stones, and park furnishings such as benches, bear-proof food lockers, and theater seats is authorized as a form of recognition for donations. Items bearing donor recognition will be located in areas that do not obstruct or impair natural, historic, or cultural resources.

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<sup>4</sup> Present policy is silent on naming programs, positions, and endowments. PPS has found that the lack of an affirmative statement in support of naming results in the under utilization of this tool to recognize donors; PPS therefore recommends that the policy include explicit authorization for its use.

In identifying opportunities and thresholds, parks and programs must keep in mind sustainability, maintenance and replacement costs of materials and plaques. Agreements, whether simple forms or more complicated documents, will include provisions regarding duration, de-naming, and renovation/removal of named paving stones or other furnishings.

Approval of this policy waiver will bring the practices of the NPS in line with norms for donor recognition in the philanthropic sector often practiced by similar government and private institutions, such as the Smithsonian Institution, major universities, museums, libraries, and hospitals. It will also expand the way in which the NPS promotes its public-private partnerships.

### Recommendation

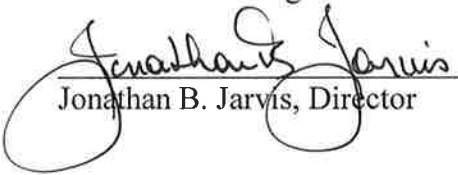
We recommend that the waiver be granted, with the understanding that the new policy provisions relating to naming will be incorporated in the revised Director's Order #21.

Concur ☒

Decline ☐

Concur with changes/comments ☐

Re-evaluate in 2017

  
Jonathan B. Jarvis, Director

1/21/2015  
Date

## **Appendix**

### Naming at Museums and Universities

#### MUSEUMS

##### Smithsonian

##### National Portrait Gallery

- Donald W. Reynolds Center for American Art and Portraiture
- Nan Tucker McEvoy Auditorium
- Robert and Arlene Kogod Courtyard Luce Foundation Center
- Lunder Conservation Center

##### National Zoo

- O. Orkin Insect Zoo
- David M. Rubenstein Family Giant Panda Habitat

##### National Museum of Natural History

- Samuel C. Johnson IMAX Theater
- David H. Koch Hall of Human Origins
- The Sant Ocean Hall
- Kenneth E. Behring Family Hall of Mammals

##### National Museum of American History

- Elizabeth MacMillan Director of the Smithsonian's National Museum of American History
- MacMillan Associate Director for Education and Public Engagement

##### National Air and Space Museum

- Lockheed Martin IMAX Theater
- Boeing Milestones of Flight Hall

##### Steven F. Udvar-Hazy Center

- Airbus IMAX Theater

##### National Museum of African American History and Culture

- Oprah Winfrey Theater

##### National Museum of African Art

- The Walt Disney-Tishman African Art Collection

##### American Art Museum (Some are named for the donor and others for former curators)

- MacMillan Education Center
- The Joe and Wanda Corn Fellowship
- The Douglass Foundation Fellowship in American Art
- The Patricia and Phillip Frost Fellowship

- The George Gurney Fellowship
- The James Renwick Fellowship in American Craft
- The Sara Roby Fellowship in Twentieth-Century American Realism
- The Joshua C. Taylor Fellowship
- The Terra Foundation Fellowships in American Art
- The William H. Truettner Fellowship
- The Wyeth Foundation Predoctoral Fellowship

George Mason University/Smithsonian-Mason School of Conservation

- G.T. Halpin Family Living and Learning Community

Metropolitan Museum of Art

- The Anna Wintour Costume Center
- Leonard A. Lauder Collection
- Leonard A. Lauder Research Center for Modern Art

Museum of Fine Arts, Houston

- Kinder Foundation Education Center
- Hirsch Library

Adler Planetarium

- Clark Family Welcome Gallery
- Samuel C. Johnson Family Star Theater

UNIVERSITIES

Harvard

- T.H. Chan School

Stanford

- Shriram Center for Bioengineering & Chemical Engineering and an endowed departmental chair
- Jerry Yang and Akiko Yamazaki Environment and Energy Building
- Jen-Hsun Huang Engineering Center
- James and Anna Marie Spilker Engineering and Applied Sciences Building
- Ram and Vijay Shiram Professor and Chair of BioEngineering

The University of Virginia

- Frank Batten School of Leadership and Public Policy